#:1698

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Case 2:25-cv-00053-FMO-BFM Document 50

1. Introduction:

I, Marc Wolstenholme, am the plaintiff in this matter, representing myself pro se. This declaration is made as a Detailed Breakdown and Analysis of Episode 3 of Arcane:

Supporting Evidence for Copyright Infringement Case, to submit additional evidence relevant to my claims against Riot Games, Inc. for copyright infringement, unfair competition, and intentional infliction of emotional distress. Please note, this document covers all of Episode 3 of Arcane after Silco's monologue as that has already been covered in a separate document.

2. Evidence Submitted:

I submit the following evidence of Detailed Breakdown and Analysis of Episode
3: Supporting Evidence for Copyright Infringement Case. This is not an
exhaustive list, but serves to demonstrate key elements of my original work and
the substantial similarities between my work and the infringing material produced
by Riot Games, Inc.

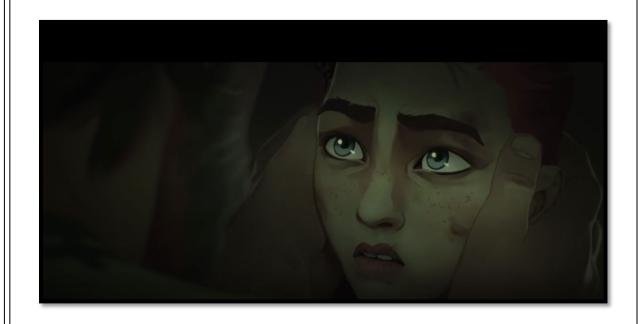
3. **Comparison of story elements:** This document specifically shows the striking similarities between an assortment of episode 3 of Arcane after Silco's monologue.

Exhibit

EXHIBIT A - GOOD HEART

Right after Silco's opening monologue, Vi is giving herself up to the Enforcers. Vi and her gang and the people of Zaun have been in a kind of "Cold War" situation with the topside since the conflict on the Bridge when Vi was young and lost her parents. Vander barges into the room.

As seen in the attached still image-



Complaint Argument: Misappropriation of Thematic and Narrative Elements in Arcane's "Good Heart" Scene.

The Issue of Narrative and Thematic Appropriation

The Plaintiff alleges that the "Good Heart" scene in Arcane, specifically Vander's dialogue to Vi, has been copied and reworked from Bloodborg with only minor linguistic modifications and structural alterations to obscure its origins. The dialogue, which serves as a pivotal mentorship moment emphasizing resilience in the face of war and suffering, is nearly identical in narrative function, phrasing, and emotional weight to a passage from Bloodborg in which Bill imparts wisdom to Josh.

This is not an isolated case but follows a clear pattern of repurposing from Bloodborg, where the original material has been fragmented, reworded, and layered into Arcane's script, creating an illusion of originality while retaining the same core meaning and character dynamics.

1. Direct Parallels Between Arcane and Bloodborg

A. Arcane - Vander's "Good Heart" Monologue

Following Silco's monologue, Vi surrenders herself to the Enforcers as part of the long-standing tensions between Zaun and Piltover. Vander interrupts, delivering the following words: "We don't have much time. I'm proud of you, always have been. You've got a good heart.

Don't ever lose it... No matter how the world tries to break you. Protect the family."

This moment serves a clear thematic function: it reinforces Vander's role as a mentor figure, imparting wisdom about endurance in times of war and hardship, emphasizing how one must protect their values despite adversity.

B. Bloodborg - Bill's Words to Josh

From Bloodborg, in Josh's POV:

his head. 'Let me just tell you, the first day of war is always the worst, it doesn't get better, but

"War is messy, it hurts. Both here and here,' said Bill, pointing to his heart and

you get tougher and rougher and numb, both here and here,' he said, pointing at his heart and

head again."

This passage shares the exact same thematic core:

- i. A mentor figure (Bill/Vander) passing down wisdom to a younger character (Josh/Vi).
- ii. A message about war and suffering—how it hardens people but also challenges them to hold onto their values.
- iii. A focus on two key aspects of resilience: emotional endurance ("heart") and mental fortitude ("head").
- iv. A cyclical repetition in phrasing to reinforce the lesson ("both here and here" vs. "don't ever lose it").

v.

2. Thematic and Structural Overlap

The similarities between these two passages extend beyond mere words; they function in identical ways within their respective narratives: *Table 1* -

ELEMENT	ARCANE (VANDER TO VI)	BLOODBORG (BILL TO JOSH)	
MENTOR FIGURE	Vander	Bill	
YOUNGER CHARACTER	Vi	Josh	
CONTEXT	A conflict escalating to war	A reflection on the start of war	
CORE MESSAGE	War and suffering harden people, but you must not lose your heart	War hardens people, but emotional endurance matters, don't lose your heart	
SYMBOLISM	Heart = Compassion, Family; Head = Strength	Heart = Emotional pain; Head = Psychological resilience	
REPETITIVE REINFORCEMENT	"Both here and here" concept is echoed	"Don't ever lose it No matter how the world tries to break you"	



This repetition of key ideas and phrasing, despite some minor alterations, makes it clear that the Arcane script lifted this emotional and philosophical moment from Bloodborg.

3. The "Pix-N-Mix" Method: A Pattern of Appropriation

The deliberate restructuring of dialogue into a "Pix-N-Mix" amalgamation is a technique seen across Arcane's writing. This method extracts specific narrative elements, disguises them through minor wording adjustments, and re-integrates them to create a falsified appearance of originality.

- Core Meaning Is Retained Despite minor wording changes, the underlying message remains identical.
- ii. Same Emotional Impact The mentor figure provides emotional guidancein a war-like situation, mirroring Bloodborg's emotional beats.
- iii. Repetitive Symbolism Both scenes use the same symbolic reference (heart and mind as focal points of endurance).

This calculated reworking ensures that Arcane's writing maintains plausible deniability while still directly benefiting from the Plaintiff's creative and deeply personal storytelling.

4. The Legal Implications: Copyright Infringement Through Thematic Theft The reproduction of fundamental narrative elements, even when slightly modified, constitutes copyright infringement if the reworked dialogue retains the substantial similarity of expression, structure, and emotional function. U.S. Law: Copyright Act of 1976 (17 U.S.C. § 501) U.K. Law: Copyright, Designs, and Patents Act 1988 **Key Legal Precedents:** Sheldon v. Metro-Goldwyn Pictures Corp. (1936) – Establishes that substantial similarity in storytelling elements and narrative structure qualifies as copyright infringement. Rogers v. Koons (1992) – Minor modifications do not protect against infringement if the core meaning and expression remain identical. Baigent & Leigh v. Random House (2006, U.K.) – Reinforces that thematic structure and key elements can be protected, not just exact wording.

Applicable Legal Arguments:

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- I. Substantial Similarity Test: The dialogue in Arcane and Bloodborg serves identical narrative and thematic functions and contains strikingly similar phrasing, tone, and symbolic reinforcement.
- II. Derivative Work Argument: Even if minor wording changes exist, Arcane's dialogue constitutes an unauthorized derivative work of Bloodborg.
- III. Intentional Misrepresentation: The "Pix-N-Mix" masking evidences an attempt to disguise theft while still benefiting from the original work's unique storytelling.

5. Conclusion: A Clear Case of Appropriation

The Vander "Good Heart" monologue in Arcane is not an original piece of writing, it is a disguised appropriation of a deeply personal and carefully crafted moment from Bloodborg. This is not an isolated incident but part of a larger pattern of lifting and reworking material from the Plaintiff's work.

- I. The parallels in theme, structure, and symbolism are undeniable.
- II. The masking through minor wording changes demonstrates an intentional attempt to obscure the origins of the material.
- III. The legal precedent establishes that such unauthorized appropriation qualifies as copyright infringement.



DETAILED BREAKDOWN AND ANALYSIS OF EPISODE 3, SEASON 1 OF ARCANE: SUPPORTING EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE

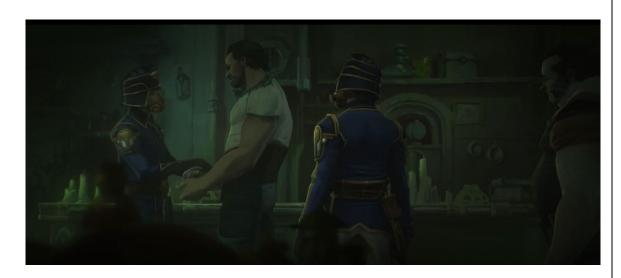
Requested Legal Actions

- Copyright Infringement Lawsuit Under 17 U.S.C. § 501 and CDPA
 1988 for unauthorized reproduction of narrative elements.
- ii. Injunction Against Further Use To prevent continued exploitation of
 Plaintiff's creative material.
- iii. Compensatory and Punitive Damages For economic losses and emotional distress caused by the unauthorized use of deeply personal material.
- iv. Legal Credit and Attribution To establish the Plaintiff's rightful ownership of the misappropriated work.

This complaint serves as formal evidence that Arcane's writing includes plagiarized material from Bloodborg, and legal action is necessary to address this systematic exploitation of another creator's work. Moreover, Criminal proceedings may need to follow to prevent more hardship to others and to the plaintiff.

EXHIBIT B- FALL GUY

In Arcane, Vander is arrested because Vi, his adoptive daughter, blew a hole in a wall.



In Bloodborg, Chris is arrested because of his best friend Lieutenant Dillon James blow a hole in The Wall (The Stand).

"As Chris recovered in a Hospital back on Ark, the Ark Special Investigations Branch (ASIB) visited him. They informed Chris that Dillon had been radicalised inside Deeproot and persuaded to blowing a hole in The Wall. ASIB stated that the breach in the wall was being coined The Rupture. The OWA attacked the area of the Rupture for a week after but did not successfully breach The Wall.

They believed that this wasn't the intent, the intent was to gather information.

They stated that because Chris was logged into the Drone which had been hacked, the hackers gained information on propulsion for levitation of the underground bullet pods. As well as information on the location and operations of Armadillo PCC because it was utilized during the night when the hard-shell was switched down; the enemy now know that it can be used at night if needed. They also know that it is located near Dunkirk.

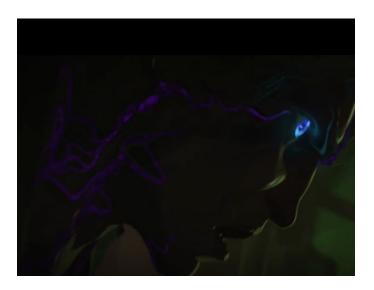
Chris was sentenced to six months in Military Cage, with no bionics or prosthetics. During this time, as part of his rehab he had to undergo intensive brain wave reconditioning and educational programming which reconnected him with the Ark and Gaia. To connect to what the Military Cage guards called the mammalian survival mode, Chris was placed under a stringent fasting plan, one meal of grassnip every three days and three scoops of water per day. The guards injected him in the neck daily with a red serum."

Key Findings.

Both Vi and Chris take the fall for somebody else's actions (both involved in blowing holes in walls). Both Vi and Chris are sent to underground prisons with harsh reconditioning programs. Later, both Vi and Chris become prominent figures of authority within the same establishment that imprisoned them. This pattern strongly suggests narrative and thematic misappropriation from Bloodborg into Arcane.

EXHIBIT C - FERAL FIGHTERS AND MUTANTS VS SHIMMER DECKARD AND SHIMMER MUTANTS.

We next see the hulking mutated shimmer Deckard kill Benzo, Grayson and the Enforcers, then he knocks out Vander and drags him away. We find out that the traitor Enforcer, Marcus, had a deal with Silco, who steps out of the mist with a bionic orange glowing eye.





1	Table 2- Comparisons				
2	Category	Bloodborg - Feral Fighters & Mutants	Arcane - Shimmer Deckard Observations & Overlaps		
3	enh hav mut	Feral Fighters are enhanced humans who	Shimmer Deckard and		
4		have undergone grotesque	the Shimmer Mutants are individuals Both involve human		
5		mutations due to exposure	transformed by the drug synthetic blood based		
6	& Concept	and genetic experiments.	grants them enhanced drugs/biochemicals,		
7	Origin	uncontrollable and used	physical abilities but at uncontrollable hyper-		
8		as tools of war or terror.	humanity. The mutants aggressive, and		
9		evallion of these	become monstrous and monstrous warriors.		
10		fighters.	unpredictable.		
11		Feral Fighters are exposed to biochem	nical GL:		
12		mutagens that twist their bodies, making	experience a violent transformation		
13		them grotesquely	transformation into process fueled by monstrous forms, chemical or		
14	Transfor	mation strong, fast, and aggressive. The	gaining superhuman biochemical		
15	Method	transformation is	strength, durability, exposure, leading to and aggression. The irreversible or semi-		
16		painful and irrevers Mutants represent the			
17		extreme, losing all semblance of their	unctable mental inctability		
18		former selves.			
19		S	Shimmer mutants The grotesque,		
20			have glowing eyes, lisfigured bodies, monstrous aesthetic of		
21		eyes, enlarged teeth, ov claws, and exposed m	overgrown chemically		
22	Appearai	veins. The mutations vi	violent, mutated fighters		
23	& Traits	vary based on ur	inpredictable identical,		
24		genetics. Mutants th	he first major which is including glowing eyes, exaggerated		
25		extreme deformities, si	ingnificantly larger physiques, and loss of cognitive		
		_	and stronger than function.		
26		reactive entirery.		I	
27			14		
28	DETAILED	BREAKDOWN AND ANALYSIS C	OF EPISODE 3, SEASON 1 OF ARCANE: SUPPORTING EVID)ENC	

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Feral Fighters act as enforcers, brutalizing opposition with unmatched strength and ferocity. They Behavior are often used as foot soldiers for warlords and crime syndicates. Mutants are barely sentient, only responding to basic instincts

Shimmer Mutants, especially Deckard, are used as enforcers for criminal organizations, exhibiting immense brutality. They lose control over their actions and attack friend and foe alike.

Both factions serve a similar role in their narratives—being chemically enhanced, expendable supersoldiers or enforcers who turn into berserk creatures.

in urban warfare, tearing through enemies with raw strength. They are used in street battles and as shock troops for criminal

Feral Fighters are deployed

and violence.

and destruction.

syndicates. Mutants are even deadlier, causing mayhem

Shimmer Mutants are deployed by Silco's faction to overwhelm enemies, engaging in street-level fights with overwhelming strength. They are used as brutal frontline soldiers in violent conflicts.

The strategic deployment of these chemically altered beings as mindless war machines is identical.

Moral & Narrative **Themes**

& Role

Tactical

Combat

Use in

Feral Fighters represent the Shimmer Mutants loss of humanity due to unethical scientific experimentation and the pursuit of power. The drugs scientific are meant to create the ultimate soldier but destroy drug grants power but their minds and souls in the erodes the person's process.

serve as a metaphor for addiction and the dangers of unchecked advancements. The identity.

Both narratives explore the dark side of scientific ambition and the human cost of seeking power through artificial enhancement.

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Examples Feral Fighters, Mutants and, Bloodborgs, from Bloodborg.

- "The Founding Families are moving towards a world without resistance, a one-world slave machine where the only survivors see them as gods. They plan to re-house their minds in bloodborgs, the pinnacle of all creation. The ultimate cybernetic human beings. Merging AI, in-brain, robotics and synthetic human self-regenerating tissue with the perfect cocktail of endless blood to be immune to all diseases and ageing."
- "Bill, The QM (Look at me, already calling him Bill) says that the genetic makeup of the Nullifidian has changed, mutated in some way and their minds are contaminated. They are uncivilised, like wild animals, they are subhuman."
- 3. "Nullifidian general term used by the Defenders to mean all people who are sub-human, all beyond the wall.

Heathens- A settlement of people, near normal, do not believe that the earth is a living entity. They live together but fight all others, they are intelligent, but many have physical mutations, most notably the size of them, they are huge, both tall and wide in comparison to humans. Many have pronounced foreheads and raised eyebrows.

The Diseased/Infected - Badly mutated and contagious, often have large open pus-filled sores and blisters, or are wrapped up in rags to hide the sores.

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DETAILED BREAKDOWN AND ANALYSIS OF EPISODE 3, SEASON 1 OF ARCANE: SUPPORTING EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE

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The Unwell- translucent skin or very pale. They cover up in sunlight to protect their skin, often live underground or in caves, they move around, scavenging and foraging mostly at night."

- 4. "'Just keep rowing gently and be silent,' said Warwick, knowing that noise and movement and even light overloads the damaged brains of the infected and the mutated, sending them into a rage."
- 5. "The smell of blood excited the severely mutated."
- 6. "...five of the mutated had somehow gotten over or through the fence and were trying to bite into an old car battery."
- 7. "His body tickled with rage. Not like the blind rage of the mutated, more of an emotionally charged rage of a damaged man."
- 8. "... hive of the mutated and the infected,"
- 9. "...most of the mutated are barely people anymore and the others, us, the Infected are slowly dying, we are rotting, we are being eaten alive from the inside. I can't control them, not the mutated, nobody can. If they become overstimulated by light or the smell of fresh blood, they rage, sometimes even ripping each other apart for blood."
- 10. "The frenzy had begun, the mutated raged on."
- 11. "Screeches of the mutated echoed through the band of standing boulders."
- 12. "Needles is one of the most avoided areas of New Kowloon because a feared gang of lawless wreckers, rapist and murderers patrol the platforms and gangways. They call themselves The Feral Fighters."

- 13. "Feral Fighters are planning something to identify blood markers instantly, so they don't have to rely on this dipping fingertip in permanent purple ink business. They know people are cheating it. My friend says they are planning something big. He has it on good grounds that a war is coming to New Kowloon, a war to drain the city of all its valuable blood and to kill everyone else."
- 14. "... force of one hundred to two hundred Feral Fighters are marching south towards the Midcity lights."
- 15. "The Feral Fighters were cowboys, more rascal soldier wannabees than an actual fighting force. They got by on bullying and harassing people. There low morals and excessive use of chemical highs meant that Cowboy Momahan could effortlessly control them."

Legal Argument for Copyright Infringement

Based on the comparison, the following legal arguments can be made:

1. Substantial Similarity in Concept & Execution

Both Bloodborg and Arcane feature a faction of chemically or biochemically altered fighters who are used as disposable war assets.

The transformation process, side effects, and eventual monstrous state are strikingly similar, down to the glowing eyes, grotesque musculature, and loss of mental faculties.

2. Thematic & Narrative Parallels

The thematic weight of Feral Fighters and Shimmer Mutants revolves around biological enhancement gone wrong, with blood drug-induced transformations serving as a key plot element in both stories.

They both critique unethical scientific experiments, the pursuit of power through unnatural means, and the loss of self.

3. Derivative Work Argument

If Arcane creators had access to Bloodborg, the resemblance could suggest that they used Bloodborg's concepts to build their own mutated enforcers, altering only surface-level details (i.e., renaming the substance from a blood based biochemical mutagen to "Shimmer" and tweaking the visual style).

Even with differences in branding, if core concepts, execution, and usage in the story remain the same, it may constitute derivative work without permission.

4. Market Confusion & Distinctiveness

The depiction of blood drug-induced mutants in Arcane could potentially dilute the originality of Bloodborg's Feral Fighters by making them seem derivative rather than a unique invention.

If Arcane's depiction gains widespread recognition, which it has, it could prevent Bloodborg from effectively using or monetizing its original concept in future media.

Conclusion

Based on the detailed comparative analysis, there are strong conceptual, thematic, and narrative overlaps between Bloodborg's Feral Fighters & Mutants and Arcane's Shimmer Deckard & Shimmer Mutants. The transformation process, the visual and physical effects, the behavioral traits, and their role within the story structure exhibit substantial similarities. These resemblances raise serious concerns about potential copyright infringement and suggest that Arcane may have derived or been influenced by Bloodborg's concepts without proper credit or authorization.

While Riot Games may argue that differences exist in execution (e.g., visual style, minor story changes), the core identity and purpose of these chemically altered warriors remain nearly identical.

Key Findings

Core Concept Parallels

Both Bloodborg and Arcane feature chemically enhanced warriors that mutate into monstrous enforcers due to exposure to a biochemical/drug compound.

Both factions serve criminal overlords, are highly unstable, and lose their humanity through their transformations.

Transformation & Visual Similarities

The transformation process in both cases is violent, painful, and often irreversible.

The resulting mutants exhibit grotesquely enlarged muscles, glowing eyes, exposed veins, and exaggerated features.

DETAILED BREAKDOWN AND ANALYSIS OF EPISODE 3, SEASON 1 OF ARCANE: SUPPORTING EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE

1 The Shimmer Mutants in Arcane and the Feral Mutants in Bloodborg both lose 2 cognitive control and become mindless killing machines. 3 4 Role & Tactical Deployment 5 In both narratives, these mutants are used as cannon fodder for street battles, 6 7 organized crime, and violent enforcement of power. 8 They are introduced as human test subjects, quickly turning into monstrous, 9 barely sentient weapons. 10 11 Thematic & Narrative Overlap 12 13 Both Bloodborg and Arcane critique unethical scientific experimentation, 14 showing how power-hungry factions exploit human subjects. 15 The overarching moral dilemmas, consequences of augmentation, and themes of 16 addiction and dehumanization are nearly identical. 17 18 19 Potential Legal Implications 20 If Bloodborg predates Arcane, it may be possible to prove unlawful derivation or 21 misappropriation. 22 A copyright infringement case could argue that Riot Games used distinctive and 23 original elements of Bloodborg in Arcane without licensing or permission. 24 25 Even if direct copying is not proven, the substantial similarities could support an 26 unfair competition or trade dress dilution claim. 27

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DETAILED BREAKDOWN AND ANALYSIS OF EPISODE 3, SEASON 1 OF ARCANE: SUPPORTING EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE

EXHIBIT D- MAKING WEAPONS FOR WAR.

Inside the Crab Market, we see Silco's Goons making weapons, preparing for war against the topside.



In Bloodborg, war or battle perpetrations are also taking place.

- 1. "They plan a mass raid on New Kowloon to loot whatever blood, weapons, energy unit's and valuables they can. Then they plan genocide, and obliteration of the city."
- 2. "The leader of the gang; Cowboy Momahan, is attempting to take control of all of The Needle district. He is trying to recruit an army to plunder the city.

 He receives weapons, alcohol and drugs from the Assemblage in exchange for raiding services and blood donations (trafficking people for their blood)."
- 3. "Warwick already Knew from Sally's situation report that this is where Jade's weapons were stashed."

- 4. "Biz popped up out of the tunnel and scanned the weapons. She found a tracking device."
- 5. "D'borg stepped towards the weapons and stopped. She scanned the weapons. Biz had planted a fusion tab on the weapons crate, she primed it to explode when scanned. Ingenious little bionic-Bee."
- 6. "We stole them from a lock-up, an ammo dump belonging to the Feral Fighters.'"
- 7. "... why did Morgan have you raid the lock-up for weapons. Marvin said something bigger is going down, do you know anything about it?"

'Morgan spoke about a cure-all synthetic blood being developed which would make all Nullifidian's disposable, Worthless. He said they plan to destroy the city, but they need the real blood first, to copy it. They are gearing up a final hunt before they destroy New Kowloon."

Comparison and Analysis- War Preparations and Strategic Weapon

Stockpiling

Both Bloodborg and Arcane feature an underground faction stockpiling weapons in preparation for an imminent war.

Arcane:

In Arcane, Silco's forces are actively producing and stockpiling weapons in the Crab Market to prepare for their assault on Piltover (topside).

The weapon manufacturing process is integral to Silco's plan to destabilize Piltover and gain full control of the undercity.

Just as Cowboy Momahan arms his gang with stolen weaponry, Silco weaponizes his own soldiers, using both traditional arms and Shimmer-induced super-soldiers.

Key Similarity: Both Bloodborg and Arcane emphasize the buildup of weapons and forces for an underground faction's war against the dominant power.

Illicit Trade: Weapons, Drugs, and War Funding

Both stories highlight the role of crime, illegal substances, and underground economies in fueling war.

Bloodborg:

"Cowboy Momahan receives weapons, alcohol and drugs from the Assemblage in exchange for raiding services and blood donations (trafficking people for their blood)."

DETAILED BREAKDOWN AND ANALYSIS OF EPISODE 3, SEASON 1 OF ARCANE: SUPPORTING EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE

"Morgan spoke about a cure-all synthetic blood being developed which would make all Nullifidian's disposable, Worthless."

Cowboy funds his war effort through human trafficking, blood trade, and weapons exchanges. His forces steal and smuggle contraband to gain the resources necessary for war.

Arcane:

Silco's economy is funded by Shimmer production and distribution, which fuels his ability to create enhanced soldiers.

The Crab Market weapon workshop operates in secret, much like Cowboy's weapons and drug deals with the Assemblage.

Silco exploits people for profit and power, much like Cowboy's blood trade and human exploitation.

Key Similarity: Both Bloodborg and Arcane feature criminal warlords who finance their wars through black market trade (weapons, drugs, and human trafficking).

Tactical Infiltration and Sabotage

Both stories also include strategic counterattacks involving weapon caches and sabotage.

Bloodborg:

"Biz popped up out of the tunnel and scanned the weapons. She found a tracking device."

"D'borg stepped towards the weapons and stopped. She scanned the weapons. Biz had planted a fusion tab on the weapons crate, she primed it to explode when scanned. Ingenious little bionic-Bee."

Here, intelligence and sabotage play a crucial role in disrupting enemy plans. Biz uses advanced tactics (a tracking device and an explosive trigger) to undermine an enemy stockpile.

Biz, In Bloodborg, is an intelligent bee drone. We see the same in Arcane, yet Jinx's are butterfly drones. Bloodborg was written at a time when drone technology was just taking off, thus this isn't a trope, it's a direct infringement... alleged.

Arcane:

Similarly, in Arcane, the Crab Market scene reveals that weapons are being strategically prepared, smuggled, and distributed, and later, Piltover forces disrupt these operations.

Jinx uses explosives and modified weapons to sabotage enemy forces (much like Biz planting a fusion tab to sabotage a weapons crate).

Key Similarity: Both Bloodborg and Arcane emphasize tactical sabotage and infiltration to counter the enemy's war effort.

Conclusion: Strong Parallels in War Preparation and Criminal Economy Key Findings: Both narratives feature an underground faction stockpiling weapons for war. **Bloodborg:** Cowboy Momahan's gang steals and hoards weapons. **Arcane:** Silco's forces manufacture and stockpile weapons in the Crab Market. Both war efforts are funded through black-market economies. **Bloodborg:** Weapons, drugs, and human blood trafficking fuel Cowboy's army. **Arcane:** Shimmer production and illegal weapons manufacturing fund Silco's forces. Sabotage and intelligence play key roles in countering enemy war plans. **Bloodborg:** Biz plants an explosive in the weapons cache to sabotage it. **Arcane:** Jinx and other characters use explosives and sabotage to disrupt Piltover forces.

Legal Implications:

This comparison highlights not just broad thematic similarities, but also detailed narrative parallels, including:

The concept of an underground warlord using illicit trade (blood/shimmer) to fund a war.

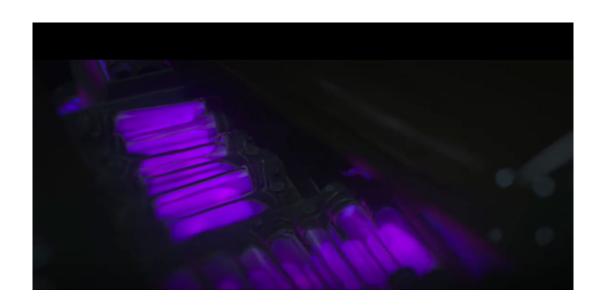
The use of stolen weapons caches and strategic war preparations.

The theme of sabotage and counterintelligence in disrupting the war effort.

These elements may constitute substantial similarities between Bloodborg and Arcane, suggesting potential intellectual property misappropriation in worldbuilding, themes, and narrative structures.

EXHIBIT E-STOCKPILING BLOOD BASED DRUGS.

In Episode 3, we see Silco and his Goons in the crab market producing and stockpiling Shimmer, which is a blood and psychoactive root plant-based drug.



In Bloodborg, many factions, such as the Feral Fighters, The Assemblage and The Ark, are harvesting and stockpiling a blood-based drug, taken in many forms such as infections, inhaling, or serum. Sometimes known as Fetal Sapien Serum. This too is made from a mix of blood harvesting, bio-engineering and psychoactive root plant or root potion. called Rescogita.

Bloodborg,

1. "I might as well admit it now, I've accessed Deep-Root, mostly to read of the Old-World. The Concoction (Rescogita) is more available in the 4th quarter because the mountains are harder to search."

- 2. "We are a stockpile of fresh blood to them. The Founding Families and others inside the Inner Assemblage have blood on the menu. If your blood type or genetic indicators are requested; the Hunters will come hunting, killing you for your blood. The Raiders will come raiding your arteries, but they usually do not kill. The Mercenaries, however, they are the worst, they will find and capture you, they will keep you semi-sedated, strapped to a surgery table for months whilst they milk your blood vessels, until you stop producing or you are no longer valuable to them. They will then either make you their bitch, their slave, or kill you slowly."
- 3. "Because the Founding Families, have created a way of producing synthetic blood from harvesting real blood and making it continually reproduce itself in bionic bodies. A never-ending feast. This makes the residence of New Kowloon worthless to them. My informants inside The Inner Assemblage have warned me to get out as fast as possible. They plan a mass raid on New Kowloon to loot whatever blood, weapons, energy unit's and valuables they can. Then they plan genocide, and obliteration of the city."

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Comparison & Analysis: Stockpiling Blood-Based Drugs

(Bloodborg vs. Arcane: Blood and Psychoactive Substances in War Economy)

1. Blood-Based Drugs and Their Role in Power Dynamics

Both Bloodborg and Arcane introduce a blood-derived drug that serves as a cornerstone for power, control, and warfare.

Bloodborg:

"We are a stockpile of fresh blood to them. The Founding Families and others inside the Inner Assemblage have blood on the menu."

"Because the Founding Families, have created a way of producing synthetic blood from harvesting real blood and making it continually reproduce itself in bionic bodies."

In Bloodborg, the drug is derived from real human blood and psychoactive plant extracts, specifically Rescogita (a root-based psychoactive substance) combined with Fetal Sapien Serum (blood-derived biotech). This serum is harvested, refined, and distributed as a highly sought-after substance, used for biological enhancement, addiction, and control.

Arcane:

Shimmer is a chemically engineered blood and root-based drug that enhances strength and aggression but is highly addictive.

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DETAILED BREAKDOWN AND ANALYSIS OF EPISODE 3, SEASON 1 OF ARCANE: SUPPORTING EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE

Shimmer is produced in the Crab Market, processed in underground labs, and weaponized to transform individuals into enhanced but monstrous fighters.

Like Bloodborg, Shimmer is a fusion of blood and psychoactive root-based compounds, combining organic and synthetic elements to create an unstable yet potent substance.

Key Similarity: Both narratives feature a powerful drug made from a mix of human blood and psychoactive plant-based substances.

2. Stockpiling, Drug Economy, and Elite Control

Both stories show organized crime, corrupt elites, and warlords hoarding these blood-based drugs to maintain power.

Bloodborg:

"They plan a mass raid on New Kowloon to loot whatever blood, weapons, energy unit's and valuables they can. Then they plan genocide, and obliteration of the city."

"Mercenaries will keep you semi-sedated, strapped to a surgery table for months whilst they milk your blood vessels, until you stop producing or you are no longer valuable to them."

Later in the Arcane series, we see jinx, "keep you semi-sedated, strapped to a surgery table", whilst she receives Shimmer treatment for her catastrophic wounds.

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Here, blood is systematically harvested for mass production of a drug that enhances, heals, or manipulates. Those in power capture, enslave, and drain people for their blood, treating them as raw materials for biochemical refinement.

Arcane:

Silco's gang stockpiles and refines Shimmer in the Crab Market, using it to gain control over Zaun's criminal underworld and to wage war against Piltover.

Shimmer users, especially Deckard and other mutants, are enhanced but also deformed, much like the "blood-milked" individuals in Bloodborg who are discarded when no longer useful.

Key Similarity: In both cases, drug production is tied to exploitation, mass harvesting, and a system of absolute control by a ruling elite.

3. Bio-Engineering and Synthetic Drug Expansion

Both narratives feature synthetic versions of the original drug, allowing for perpetual production.

Bloodborg:

"The Founding Families have created a way of producing synthetic blood from harvesting real blood and making it continually reproduce itself in bionic bodies."

This biotech expansion allows the elite to maintain a supply of blood-based serum without needing constant new victims.

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DETAILED BREAKDOWN AND ANALYSIS OF EPISODE 3, SEASON 1 OF ARCANE: SUPPORTING EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE

Arcane:

Shimmer is refined and synthesized, allowing for mass production and increasing its impact on Zaun's war economy.

Shimmer experiments lead to enhanced versions of the drug, making it more powerful and more addictive. The end version in Season 2 of Arcane successfully turns both Warwick and Viktor and his cult into Bloodborgs.

Key Similarity: Both Bloodborg and Arcane depict the evolution of a bloodbased drug from raw extraction to synthetic mass production.

Conclusion: Strong Parallels in Drug-Based Power Structures

Both narratives feature an underground faction mass-producing a blood-derived, psychoactive drug.

Bloodborg: Rescogita & Fetal Sapien Serum (blood and bio-tech serum).

Arcane: Shimmer (blood-infused drug with psychoactive root extracts).

Both drugs are controlled by powerful elites who exploit and enslave people to produce them.

Bloodborg: The Founding Families capture, drain, and discard people for blood harvesting.

Arcane: Silco's gang experiment on and addict people to Shimmer, turning them into dependent warriors.

DETAILED BREAKDOWN AND ANALYSIS OF EPISODE 3, SEASON 1 OF ARCANE: SUPPORTING EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE

Both drugs are used for enhancement but come with terrible costs.

Bloodborg: Victims are harvested for serum, discarded, or turned into slaves.

Arcane: Shimmer enhances fighters but mutates them into monstrous forms.

Both drugs evolve from natural extraction to synthetic production.

Bloodborg: Synthetic blood allows continuous production without fresh victims.

Arcane: Shimmer is refined and modified for stronger, more potent versions.

Legal Implications

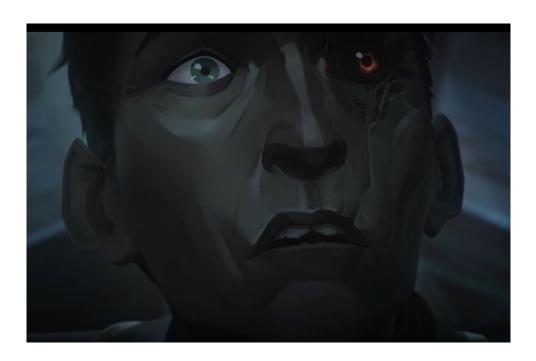
This comparison suggests not just thematic overlap, but detailed narrative similarities, including:

- i. A blood-harvesting economy that fuels war.
- ii. Drug-induced mutations and enhancement.
- iii. Mass exploitation of people for biotech experimentation.

These conceptual parallels strengthen a case for potential IP infringement, especially regarding the role of blood-drug economies, elite control mechanisms, and bioenhancement themes.

EXHIBIT F- Nation of Zaun

In Arcane, Silco and Vander argue about war against topside. Silco states that they once had a shared vision, not just for the lanes, but for the whole of the underground united as one, the nation of Zaun.



In Bloodborg, Cowboy Momahan is alleged to be the character who Silco was created from. "Cowboy Momahan, the leader of the Feral Fighters, has vowed to unite the gangs, the hunters and raiders of The Needles district, to fight against other districts, for full control of New Kowloon. He has announced that he will be the first King of New Kowloon."

Comparison & Analysis: Nation of Zaun

(Bloodborg vs. Arcane: The Vision of a United Underworld & Leadership in Rebellion)

1. The Vision of a Unified Underground Faction

Both Bloodborg and Arcane establish powerful figures who seek to unify an anarchic, crime-ridden underworld under a singular leadership. Their goal is not just survival, but dominance and independence from the ruling elite above them.

Arcane (Zaun & Silco)

Silco envisions a united underground city, independent from the oppressive topside of Piltover.

He believes in uniting the fractured gangs and criminal organizations under one banner to form the nation of Zaun.

His rhetoric suggests that before his ideological and violent split with Vander, they once shared a dream of a greater, self-sustaining underground nation.

Bloodborg (Cowboy Momahan & New Kowloon)

Cowboy Momahan mirrors Silco in his ambition to consolidate power over the divided districts of New Kowloon.

He seeks to unite the gangs, raiders, and hunters under his rule, establishing a dominant force in the chaos.

His goal is not just control but monarchy, declaring himself the first King of New Kowloon, solidifying his authority over a lawless landscape, which is also something Silco later aspires to become.

2. The Leader as a Symbol of Rebellion

Both Silco and Cowboy Momahan embody the leader of the downtrodden, turning their pain and past grievances into a calculated bid for absolute power.

Silco as the Revolutionary

He views Piltover's oppression as an existential threat to Zaun's people, justifying extreme measures in pursuit of freedom.

His leadership is steeped in ideology, using fear, loyalty, and political manipulation to secure his rule.

Silco's vision is nation-building, establishing Zaun as a recognized power, rather than simply seizing control of criminal operations.

Cowboy Momahan as the Warlord-King

Unlike Silco's political approach, Momahan embodies brutal gang rule, where strength and bloodshed determine hierarchy.

He consolidates power through violence, coercion, and alliances, ensuring total dominance over the Needle District before expanding outward.

His ambition is less ideological and more about raw power, establishing himself as a king rather than a political leader.

3. The Power Struggle Against the Status Quo

Both characters wage war not just against their immediate enemies, but against an established societal hierarchy that refuses to acknowledge them.

Silco fights against Piltover's control, seeking independence from the technologically advanced city that governs trade and innovation.

Momahan fights for absolute rule over New Kowloon, attempting to overthrow rival factions and become a dictator.

However, while Silco seeks legitimacy for Zaun, Momahan thrives on anarchy and lawlessness, aiming to rule by brute force.

Table 3- Silco and Cowboy.

ELEMENT	ARCANE – SILCO & ZAUN	BLOODBORG – COWBOY MOMAHAN & NEW KOWLOON
GOAL	Create an independent nation of Zaun	Become the first King of New Kowloon
METHOD	Political manipulation, military control, drug trade	Violence, gang unification, blood harvesting
LEADER'S VISION	Freedom from Piltover's rule, self-governance	Dictatorship over all rival factions
MEANS OF CONTROL	Shimmer (mutant drug), alliances, ideological loyalty	Blood-based drugs, forced recruitment, warfare

The core thematic overlap lies in both stories centering on a crime lord figure attempting to unify a fractured underworld through violence, strategy, and a vision for a new order. The execution differs slightly—Silco's dream is political and strategic, whereas Momahan's is brutal and totalitarian.

However, the striking resemblance between their arcs, motivations, and tactics raises strong similarities that warrant further investigation into potential infringement. The parallels in themes of gang unification, overthrowing oppression, and the concept of an outlaw nation suggest that Bloodborg's Cowboy Momahan could have served as a template for Silco in Arcane.

EXHIBIT G – Brothers- Brains and Brawn

G1- Brains and Brawn

Right after Silco speaks about the nation of Zaun, up on the rail platform of the "Crab Market," Silco says to Vander, "Do you even remember? I trusted you... and you betrayed me."

It shows the Silco/ Vander struggle in the water, which resulted in Silco having the left side of his face scarred and looking like a robot. Silco's left eye and his face wound look like they have been fixed with augmented bionics.

Vander says, "What I did to you, I've never forgiven myself, you were my brother."

Silco touches his left, orange, eye.

It is alleged that even this dynamic of- brothers in arms and code- is swiped and masked from Bloodborg.

In Bloodborg,

"Chris Redgrave and Dillon James had been best friend since meeting in an Ark

Defense training unit at the age of fifteen. Chris the brains, Dillon the Brawn."

Even this description matches the juxtaposing of Silco's and Vander's physical structures.

"Chris the brains, Dillon the Brawn."







Bloodborg,

- 1. "Next to this, a picture of Chris and his best friend laying on the grass under a great oak tree, holding their baby boys, Simon and Peter. Behind them, resting their heads on the shoulders of Chris and Dillon, lay their loving wives, Jane and Emma."
- 2. "Chris Redgrave and Dillon James had been best friend since meeting in an Ark Defence training unit at the age of fifteen. Chris the brains, Dillon the Brawn. They completed Raptor training together, Chris was awarded Best Recruit of the intake, Dillon was the Milling champion, their training officer commented that he had never seen such raw aggression and emotion in any recruit. They joined the 2nd Raptor Airborne Regiment of the Ark Defence and were stationed on the wall together aged sixteen to eighteen. At the age of nineteen their loving wives each gave birth to healthy baby boys.

 At twenty-two Chris moved over to the 2nd Raptor Airborne intelligence platoon and Dillon stayed mainstream; commanding units, Raptor Jumping on the hostile side of the wall, then he became a Milling instructor. They remained best of friends."

G2- Benzo and Bill the QM.

However, The dynamic runs even deeper. When they were younger men, there were three of them, close like brothers. Vander, Silco and the chunkier Benzo, who ended up owning and running a trading shop of sorts.

It is alleged that Benzo is Bill Rewan, The QM from Bloodborg. Yet in Arcane, they took Bill Rewan and his role as Quartermaster, and merged it with Mr Wu Zhang's trading shop, to bring the narratives align for what was needed in Arcane.







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In the Army, a Quartermaster is an officer who supervises logistics and requisitions, manages stores or barracks, and distributes supplies and provisions. He has a store, which people go to, to get what they need, much like Benzo in Arcane, who talks about collections and counting in supplies in the Lanes. Benzo even looks like Bill, The QM. Even down to the mutton chops sideburns. In later life, Chris also adopted the QM's beard as a statement of remembrance of their shared trauma and loyalty.

Bloodborg,

- 1. "To be fair to him, the QM seems to be a very interesting chap. His name is Bill Rewan. He requested that we call him Bill. It's funny isn't it, we would never get away with calling an officer by his first name back on Ark. This guy is clearly very experienced, you can see that just by looking at him; he looks war-torn, he looks like a man uncommitted, why is he so phlegmatic at a time like this."
- "Back to the QM, he looks old, much older than 36, Veda says he is 36, which means he was 21 when he was first based here. I imagine he had a full head of bright ginger hair back then. He now has dusty gingery-brown hair, and not a lot of it. He has more hair on his cheeks and in his ears than on his head."
- "Chris Redgrave rocked in his burgundy leather chesterfield, at his desk." Clicking his ballpoint pen with one hand and caressing his mutton chop beard with the other, he gazed out of the window, over his land."

G3- Bill and Chris injured by Warwick, aka Lieutenant Dillon James's "betrayal."

In Arcane, Silco touches his left, orange, eye, and says, "You still don't understand, can you imagine what it's like, when your blood mixes with the filth and all the toxins eat through your nerves."

In Bloodborg, through fractured backstories and flashbacks, we find out that Warwick, who was Lieutenant Dillon James back then, defected, blowing a hole in The Wall. This "terrorist" event is known as the Rupture. Dillon James had uncovered terrible things and was being radicalized via Deep-Root, inside the Higher Consciousness, exactly what Viktor does to his subjects in season 2 of Arcane.

Dillon James wasn't planning on his "Brothers" Chris (Silco for this part of the narrative story) and Bill the QM (Benzo) being present at the time of the explosion. But it was too late, both of his "Brothers in Arms" were severely wounded by the explosion.

It is alleged that the method of "betrayal" has changed, having undergone manipulation to fit it into Arcane and the cardboard character stories of LOL. The injuries are strikingly similar, but the people who received the injuries, and their causes have been rearranged to squeeze them into Arcane. Bill's eye wound is changed to Silco's eye wound. Bill has to drink bionic acid and must take injections in his neck, but Silco injects directly into his eye... alleged.

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Bloodborg,

- 1. "His friend Bill Rewan knelt in the dry mud, his chunky hands gripping the raw flesh of his skull. His exposed jawbone rattling in a nerve fit. His eyeball was dangling from its socket. Lieutenant Dillon James was gone, no trace."
- "Entering a Jet-Copter he called the High Commander and Bill Rewan, he asked Bill to locate Dillon and The High Commander to switch down the Hard-shell. Both complied. A few minutes later, Chris boom ejected from the cockpit of the Jet-Copter in the stronghold and ran towards the wall. Bill was much closer, running towards Dillon. Dillon turned, shocked to see Chris, he rammed his hands against the surface of the membrane which cocooned him. 'NO,' he mutely screamed, as the wall in front of him exploded. Dillon was gone.

As Chris recovered in a Hospital back on Ark, the Ark Special Investigations Branch (ASIB) visited him. They informed Chris that Dillon had been radicalised inside Deep-root and persuaded to blowing a hole in The Wall. ASIB stated that the breach in the wall was being coined The Rupture. The OWA attacked the area of the Rupture for a week after but did not successfully breach The Wall."

"The QM is sitting at the back, swigging a dirty red liquid from a plastic gallon bottle. It looks like bionic acid".

1	Comparison & Analysis: Bill Rewan (QM) & Benzo, and The Betrayal			
2	Injuries			
3	(Bloodborg vs. Arcane: Quartermasters, Betrayals, and Rewritten Trauma)			
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6	1. The Quartermaster vs. The Shopkeeper			
7	Both Bloodborg and Arcane feature a seasoned, world-weary figure who acts as a			
8	supplier, logistics officer, and mentor to the younger generation in a dangerous underworld.			
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10	Arcane (Benzo – The Trading Post Owner)			
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12	Benzo is the third brother-in-arms between Vander and Silco, akin to a neutral,			
13	stable presence in the Lanes.			
14	He runs a shop that serves as an underground hub for trade, supplies, and			
15	contraband, providing necessary materials for those fighting against the topside.			
16	His loyalty to Vander places him at odds with Silco's vision for a militarized			
17	Zaun.			
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19	Bloodborg (Bill Rewan – The Quartermaster, QM)			
20	Bill Rewan, also known as The QM, functions as a Quartermaster in a military			
21	context, controlling weapons, supplies, and resources for his unit.			
22 23	He is described as weathered, world-worn, and physically battered, a man who			
24	has seen and suffered too much.			
25	His role is more militaristic than Benzo's, yet he and Benzo serve the same			
26	narrative function, a respected supplier, tied deeply to the past of the main characters.			
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Key Similarities

Both act as suppliers in a crime-ridden, militarized underworld.

Both are tied to a brotherhood of three men, sharing history, trauma, and eventual division.

Both show signs of age and wear, Benzo is chunky and bearded, while Bill is battle-hardened with a distinct look, including sideburns and scars.

2. The Betrayal & The Injury Parallels

One of the most striking similarities between Bloodborg and Arcane, for this part, is the rearrangement of the betrayal event and the shifting of injuries from one character to another.

Arcane (Silco's Betrayal & Eye Injury)

Silco and Vander once fought together for Zaun's freedom, but a violent betrayal by Vander left Silco severely injured.

The injury: His eye, which is exposed to Zaun's filth and toxins, becomes a defining characteristic, leading to his addiction to injections and his descent into villainy.

This betrayal is personal rather than ideological, driven by a struggle for power.

Bloodborg (Dillon James' Betrayal & Bill Rewan's Eye Injury)

Bill Rewan suffers almost the exact same injury as Silco, with his eyeball dangling from his socket after the explosion Dillon James triggers.

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Dillon, like Viktor in Arcane's Season 2, is radicalized by an advanced consciousness inside Deep-Root, pushing him into terroristic action.

This betrayal is not personal but ideological, with Dillon James convinced he is fighting against a corrupt system.

The injury is shifted in Arcane, Bill's gruesome fate becomes Silco's, while Chris's emotional damage mirrors aspects of Silco's character arc.

Key Similarities

The eye injury parallels are explicit, Bill's gruesome wound in Bloodborg closely mirrors Silco's in Arcane.

Both betrayals involve a trusted brother-in-arms injuring their allies.

Both injured men (Bill/Silco) rely on some form of injected substance to manage their wounds; Bill drinks bionic acid, while Silco injects a liquid into his damaged eye.

The trauma caused by the betrayal shapes the path forward; Silco descends into villainy, while Bill becomes a broken yet still operational figure.

Arcane reassigns parts of the injury; Silco takes the physical wound that Bill suffered, while Chris takes the emotional weight of the betrayal.

Table 4- The Dynamics of the Three.

ELEMENT	ARCANE – BENZO & SILCO	BLOODBORG – BILL REWAN & CHRIS
ROLE IN STORY	Shopkeeper, supplier, third brother-in-arms	Military Quartermaster (QM), logistics officer, key veteran figure
CONNECTION TO THE BETRAYAL	Vander betrays Silco, leaving him for dead	Dillon James unknowingly injures Chris & Bill in "The Rupture"
PHYSICAL INJURY	Silco's eye is damaged, forcing him to inject a serum	Bill's eye dangles from its socket, leading to his reliance on bionic acid
AFTERMATH OF BETRAYAL	Silco becomes Zaun's dictator, addicted to injections	Bill is broken but remains a supplier and veteran, Cowboy takes this role.

Conclusion.

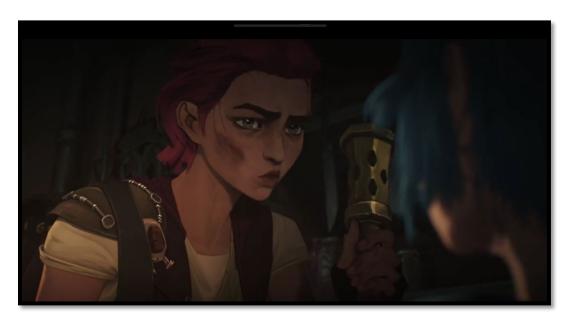
This comparison strongly supports the claim that Arcane borrowed and restructured the narrative elements of Bloodborg, particularly in the betrayal event and its consequences. The concept of a third brotherly figure (Benzo/Bill) being injured by an ideological defector (Dillon/Vander) is a near-direct parallel, with only minor adjustments made to fit Arcane's world-building.

Additionally, Silco's disfigurement appears to be lifted from Bill Rewan's injury, repurposed with a different cause but retaining the core imagery of a traumatic, eye-damaging betrayal. This suggests that Arcane adapted elements from Bloodborg but altered them enough to obscure the direct connection—though the structural and thematic overlaps remain undeniable.

EXHIBIT H- SMOKE FLARE/ SMOKE GRANADE

Preparing to rescue Vander, Vi takes his metal anvil-like punching gloves. Vi gives Powder a smoke flare/ smoke grenade.

Vi say to Powder, "You're not ready. You're all I have left; I can't lose you. Here, if they come for you, take this and run. Wherever you are, light it up and I'll find you.



Later in Arcane season 1, we see Jinx (older Powder) light up the blue smoke

flare.



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27 28 In Arcane, "You're not ready. You're all I have left; I can't lose you."

In Bloodborg,

- "'I've lost so much, I can't bear to lose my brothers as well,' whispered Rook, thumbing the necklace."
- "'We should come with you."

'No chance, Matteo you wouldn't make it to Midcity never mind lower city.'

'What's that supposed to mean-

'Rook's right Matt, you just aren't in the best of shape right now. I should come with you though Rook.'

'You wouldn't keep up either Mac."

"'Come on man, you know I got this, just plan the route.' 'Alright I'll do it but please be careful. Here, take a few smoke flares in your knapsack, don't let them get a signal lock on your heartbeat.""

Both stories show a more physically abled and skilled sister looking after the wellbeing of her "siblings." Both worry about losing them; after already losing so much, both have lost their parents. Both are concerned that their "siblings." are not prepared. In both stories a flare is handed over as a symbol of caring and protection.

Comparison & Analysis: Smoke Flare/ Smoke Grenade

(Bloodborg vs. Arcane: Sibling Protection, Readiness, and Symbolism of the Flare)

1. The Role of the Older Sister & Sibling Protection

Both Arcane and Bloodborg feature a strong-willed, physically skilled older sister figure who takes on the responsibility of protecting their younger, less capable sibling. In both cases, the older sister feels a deep sense of duty, guilt, and love, stemming from past loss and the brutal world they inhabit.

Arcane (Vi & Powder/Jinx)

Vi is physically capable, the leader of their gang, and the protector of Powder.

After losing their parents and being taken in by Vander, Vi assumes a parental role for Powder, always looking out for her.

She worries that Powder is not ready for real combat and does not allow her to come along to rescue Vander.

She hands Powder a smoke flare as a last resort, symbolizing protection, trust, and a promise to find her.

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McCauley, who are astonishingly similar to Claggor and Mylo of Arcane.

Bloodborg (Rook & Matteo/Mac)

She has lost a lot already and doesn't want to lose them as well, emphasizing her emotional and familial burden.

Rook is similarly tough, independent, and protective of her brothers, Matteo and

Like Vi, she refuses to let them accompany her because they are not ready or physically strong enough to survive the mission.

She is given smoke flares by a comrade to use in an emergency, much like the flare Powder receives from Vi.

Key Similarities

Older sibling assumes responsibility for their younger siblings after losing their

Both feel a mix of guilt, love, and duty, struggling between letting their siblings help and keeping them safe.

Both explicitly state that their younger sibling is not ready.

Vi says, "You're not ready," while Rook outright refuses Matteo and Mac's offer to come with her.

A smoke flare is given as a symbol of protection and a promise to return.

Key Differences

Powder.

In Arcane, Vi herself gives the smoke flare to Powder, marking it as a sisterly bond and promise.

In Bloodborg, Rook does not personally give the flares but instead receives them as part of a survival strategy and a symbol of care, though the intent remains the same.

Powder actively uses the flare later to call for Vi, whereas Rook's use of the flares for survival, escape and evasion.

2. The Symbolism of the Smoke Flare

In both stories, the smoke flare represents trust, care, and a last-ditch method of protection.

Arcane (Blue Smoke Flare & Vi's Promise)

The flare represents a beacon of hope, a promise that Vi will come back for

Its later use by Jinx is an emotional moment, marking her yearning for her lost sister despite the path she has taken.

Bloodborg (Smoke Flares & Tactical Survival)

The flares are given to Rook as a practical tool to avoid detection and as a lastditch emergency signal.

They serve a similar function as in Arcane, ensuring a way to reconnect if something goes wrong.

Key Similarities

Both stories give the flare as a means of safety and protection. Both are given in moments where one character refuses to take the younger, less experienced sibling into danger. Both symbolize a connection between siblings or comrades in a dangerous world.

Key Differences

In Arcane, the flare is an emotional safety net, a way for Vi and Powder to reconnect. In Bloodborg, the flare is framed more as a survival tool, with a tactical, military application rather than just an emotional one.

Table 5- Flare Comparison.

ELEMENT	ARCANE – VI & POWDER	BLOODBORG – ROOK & MATTEO/MAC
OLDER SIBLING ROLE	Vi protects Powder, sees her as too weak for combat	Rook protects her brothers, refusing to let them join her
KEY PHRASE	"You're not ready."	"You wouldn't keep up."
REASON FOR FLARE	Vi gives Powder a flare to protect her and promise to return	Rook is given flares to avoid signal tracking and for emergencies
SYMBOLISM OF THE FLARE	Represents a sisterly bond and a promise	Represents tactical survival and reconnection if needed
EVENTUAL USE OF FLARE	Powder/Jinx later lights it up to call Vi	No mention of Rook using the flare in this excerpt

Conclusion

This comparison demonstrates a strong narrative parallel between Arcane and Bloodborg, particularly in the older sister-younger sibling dynamic and the use of the smoke flare as a safety measure. While Bloodborg leans more into survival and tactical applications, Arcane shifts the focus onto emotional connections and character relationships.

However, the key themes- protection, unreadiness, and a flare as a symbol of safety- are identical, suggesting that Arcane may have restructured the narrative while retaining its core essence from Bloodborg.

EXHIBIT I- ON IT.

In Arcane, when Vi and her two adoptive brothers are braking Vander out, Vi gives Mylo (Who is alleged to be Mac in Bloodborg) an order. He replies, "I'm on it."

This is a military reply.

In Bloodborg, Mac is given an order. He replies, 'I'm on it like boom sonic.'

Bloodborg quote – "Quick, someone turn on the interceptor to see if they followed Rook,' said Mateo, pointing to the interceptor with a stout finger, rolls of fat coiled at his nape as he tilted his head.

The group of Gangway children sitting on the floor in a semi-circle, all turned to face the makeshift digital radio.

'I'm on it like boom sonic,' called Macaulay, already scrambling to the Interceptor, his shabby blonde hair sweeping the communications display as he reached for the headset."

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sonic."

Comparison & Conclusion: "On It"

Both Arcane and Bloodborg feature a military-style response when a younger brother figure is given an order.

Arcane: Vi orders Mylo to act, and he responds, "I'm on it."

Bloodborg: Macaulay is given an order and responds, "I'm on it like boom

Key Similarities

Both use a quick, affirmative response, showing readiness and familiarity with taking commands.

Both are in high-stakes, team-based situations, with younger brothers playing a supporting role.

Both characters are allegedly counterparts (Mylo = Macaulay).

Key Difference

Arcane keeps it short and military-like, while Bloodborg adds slang and energy with "like boom sonic."

Conclusion: The phrasing in Arcane appears to be a simplified adaptation of Bloodborg's Macaulay, maintaining the same essence but streamlining it for tone and brevity.

EXHIBIT J- HEXTECH BREAKTHROUGH

As Professor Heimerdinger is about to enter the laboratory, Jayce and Viktor have a breakthrough in their Hextech experiments. There is an explosion of ringed light, suggesting light being a component of Hextech, which is later used for light speed travel. This has never been an aspect of Hextech before Arcane.

As the guards kick open the doors, we see Jayce and Viktor floating, with the universe and constellations mapped holographically above them. We see a central blue ball or sphere of energy with a glowing white light at the core. We see a figure of eight, or the infinity symbol mapped around them.



In Bloodborg,

The energy / technology system is called BlueBeam, although it isn't explicitly named as so, but is repeatedly used in many POVs. The same energy is used in the forearm device of D'borg as a type of blue energy mapping system and integrated command system with many functions. It also powers D'borg's blue laser eye. It is also used to open eye portals and teleportation windows.

To divulge narrative secrets to the court for the sake of transparency.

One of BlueBeam's literary functions is a satirical play on the Project Blue Beam conspiracy theory. If you go to the M.W. Wolf webpage, it can be observed that much of the M.W. Wolf catalog has satirical undertones.

In Bloodborg, BlueBeam energy is tied to blood energy and blood engineering, but this is implicitly implied in the manuscript. In short, the energy is a mix of Fusion energy, Blood engineering, electromagnetic and higher consciousness. It is used for weapons, to open inter dimensional portals, quantum entanglement and transportation via teleportation.

Bloodborgs are created via the same, yet in the manuscript, even the blood engineering goes deep into the science, describing how early state embryos produce trophoblasts and these are harvested from blood. BlueBeam, portrayed via technologies, aesthetics and eyes are therefore major plot and structure features of Bloodborg.

Yet the use of said literary devices goes even deeper. The M.W. Wolf Megaverse of Fiction books are interlinked in a spaghetti-like universe, much like Stephen King and Brandon Sanderson have achieved. BlueBeam and using eyes as a storytelling device ties into

The Inverted Organelle theory of consciousness and the universe (IO-CU). The IO-CU is a real-

life scientific theory of everything. The IO-CU also underpins all of the M.W. Wolf Megaverse of Fiction. Eyes are organs of the body which connect consciousness and the internal universe to the perceived outside universe. Eyes are the organ in which reality is inverted.

https://www.mwwolf-fiction.co.uk/the-inverted-organelle

Thus, these elements of Bloodborg, also in Arcane, are not just uses of an eye or a blue ball to look cool. The meaning and use in the story goes far deeper than anything which could be perceived as chance. Yet, in Arcane, they flash eyes but do not link it to any meaning, and even Hextech is left ambiguous, seemingly retconning Riot's history of Hextech.

The transformation of Bloodborg's Bluebeam concept from an electromagnetic pulse and transportation technology to a magical energy source is alleged to have given Riot Games the creative freedom to re-build the lore, style, use and origins of hextech.

The Blue Energy Balls from Arcane have a distinct visual and conceptual identity tied to hextech and the magical essence that powers the world of Runeterra. The crystals, however, take on a more mystical and magical approach, powering technology through magical energy rather than the electromagnetic pulses of the Bloodborg manuscript.

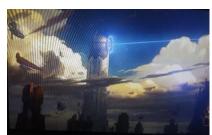
Hextech in its in-game forms, long predates the circulation of the Bloodborg manuscript. However, its portrayal, origins and use in Arcane is far different to its portrayal in the LOL games. This will be explored and evidenced in a separate document. In short, in the Games lore, Hextech is powered by Hex crystals which come from the magic souls of giant purple crystal scorpions called Brackern.

This use of Hextech, in this form, alleged to have been swiped from Bloodborg, is central to the plot of Arcane. The teleporting building of the opening of Episode 4 is taken from a chapter of Bloodborg called Orion's belt. This explains more of Hextech and its use as teleoperation travel.



This is Orion's belt in space. I called this chapter Orion's belt because when the cyborg is about to teleport three circles line up, like Orion's belt. She also lines the three districts up, which look like Orion's belt from above. She lines up the map with the hologram map to select her teleportation destination. We see this almost exactly replicated in Arcane.







In bloodborg.

1. "They looked like the three stars of Orion's belt, a constellation D'borg recognised. She looked up to find the constellation, the clouds blocked her view. She noticed a storm brewing in the south, approaching speedily.

She pushed a button on an infinity symbol like device embedded into her forearm. The infinity symbol popped up out of her arm, it shot out a blue ray, which mapped the city and projected it up as a hologram.

D'borg pushed her arm twice, The City's three main districts in her hologram zoomed down, mapping over an Old-world map of New Kowloon, formally...

With the two maps layering each other, she could see the three districts.

D'borg mapped the quickest route to the district over midtown."

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2.	"She felt the tickle building. She looked down at the inside of her forearm.
	Inside her arm, attached to her was a device in the shape of a figure of eight.
	She traced her finger over the figure of eight, it rose from her arm and out
	flicked a globe with several glowing spots. She zoomed in to a blue spot, the
	She rotated the figure of eight zooming it down onto a point near the Air-
	blade, hovering over an open-top building.
	Energy built up in the air around her, cocooning her in a ball of electric, she
	panted hard as the cocoon thickened, insulating her from being ripped apart
	during teleportation, like an egg transported through a fallopian tube.
	With an almighty crash of thunder and a blinding bolt of white light, she was
	gone."

Comparison & Conclusion: Hextech breakthrough

Comparison Between Arcane and Bloodborg

Both Arcane and Bloodborg depict breakthrough or realization moments involving blue energy, light manipulation, and teleportation-like technology that play a crucial role in their respective worlds.

Key Similarities

Blue Energy & Light-Based Technology

In Arcane, Hextech energy is shown as blue, glowing energy spheres, with the figure-eight/infinity symbol appearing during experiments.

In Bloodborg, BlueBeam energy is also blue and light-based, mapped through holograms, energy projections, and teleportation mechanics.

Both Hextech and BlueBeam are central to their worlds' technology, transformation, and movement.

Breakthrough Moment & Floating Experimenters

In Arcane, Jayce and Viktor float in a zero-gravity-like state when they first harness Hextech's power, and holographic constellations form around them.

In Bloodborg, D'Borg uses a BlueBeam device embedded in her forearm to create a holographic map of the city, which projects constellations (Orion's Belt) to guide teleportation.

In Arcane, Hextech evolves into a teleportation mechanism, with blue portals allowing rapid movement (e.g., Episode 4, where a teleporting building is introduced).

In **Bloodborg**, D'Borg's BlueBeam technology allows her to map cities, align them like Orion's Belt, and teleport via quantum entanglement.

The Infinity Symbol & Energy Mapping

In Arcane, the figure-eight/infinity symbol appears during Hextech research.

In Bloodborg, D'Borg's BlueBeam device is shaped like an infinity symbol, which activates her teleportation abilities. Jayce, later, also has a crystal embedded into his arm.

Aesthetics & Lore Transformation

In Arcane, Hextech was previously powered by Hex Crystals (from Brackern creatures in LoL lore), but in Arcane, it is reimagined as a more mystical energy source for technology and teleportation.

In Bloodborg, BlueBeam energy is a fusion of electromagnetism, blood engineering, and higher consciousness, used for interdimensional travel and teleportation.

Arcane appears to remove the deeper theoretical underpinnings that Bloodborg explores, making Hextech more of a visually appealing plot device rather than a scientifically rooted energy system.

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Arcane's Hextech breakthrough sequence strongly resembles Bloodborg's BlueBeam concept in its:

- i. Visual aesthetics (blue light, floating holograms, and constellations).
- ii. Teleportation mechanics (alignment of three points like Orion's Belt).
- iii. Energy manipulation (infinity symbol and electromagnetic mapping).
- iv. Breakthrough moment (floating in energy, mapping new realities).
- v. Arcane appears to have altered Bloodborg's BlueBeam from a scientific, engineered energy system to a more mystical/magical power source.
- vi. The blue teleportation event in Episode 4 of Arcane bears a striking resemblance to Bloodborg's Orion's Belt teleportation scene, further supporting the claim of narrative repurposing.

Final Allegation:

The key visual and conceptual elements of BlueBeam (from Bloodborg) appear to have been altered and absorbed into Arcane's Hextech system, which was previously based on a completely different lore (Hex Crystals and Brackern magic). This places Bloodborg's content into all of the products of Riot Games.

EXHIBIT K-POWDER FALLING.

In episode 3, as Vi and her gang are attempting to free Vander, Powder sets-off a hex crystal explosion. She is falling in slow motion on her back. This is the first cyclical story beat of Silco's drowning scene. It is alleged, and already covered, that this is swiped from Bloodborg's trauma writing representing the Plaintiff's true life struggles with drowning, falling and sinking in his reliving of events during sleep and sleep paralysis.

Evidence of this has been presented in:

- PLAINTIFF'S DETAILED BREAKDOWN AND ANALYSIS OF THE
 OPENING SCENE OF EPISODE 3 OF ARCANE AND SILCO'S
 MONOLOGUE
- 2. SECOND DECLARATION OF MARC WOLSTENHOLME REGARDING
 PUBLIC STATEMENTS BY ARCANE CREATORS
- 3. PLAINTIFF'S MOTION IN LIMINE TO ADMIT EVIDENCE- Psycho-Emotional Analysis



EXHIBIT K- SEVIKA LOSES HER LEFT ARM

Bloodborg,

- 1. "Noticing her mistake, D'borg flung her bionic left arm up and dropped her shoulder forward, protecting her head. She dropped too her knees and leaned into the explosion."
- 2. "She tried to sit up but her right leg, which was partly real born flesh, was missing and her left arm sat on the bonnet of an old yellow cab. The mangled fingers of the hand clawed at the yellow paint as her arm danced off the edge of the bonnet."
- 3. "D'Borg lay back against the roof of the derailed carriage with her mangled arm pinned above her, bleeding down onto her head."



4 | Arcane

Comparison & Conclusion: D'Borg's Rebuild vs Sevika's Cybernetic Arm in

Comparison Between Arcane and Bloodborg

In Arcane, Sevika loses her left arm in combat and later replaces it with a cybernetic prosthetic, enhanced with Shimmer and Hextech technology. Her cybernetic arm makes her a powerful enforcer for Silco, increasing her strength and combat effectiveness. In season two, her arm is trapped/pinned against something after it is stabbed with a blade. The arm is again rebuilt, by Jinx, using scavenged machine parts.

In Bloodborg, D'Borg loses multiple limbs, including her left arm and part of her leg, after an explosion in the scrapyard. She is later rebuilt using scavenged machine parts, with her body patched together with old-world metal, vehicle parts, and synthetic flesh. The reconstruction is carried out by autonomous robotic Air-Blades, who inject her with biological and technological enhancements, allowing her to return to battle stronger than before. In her final fight against Warwick, her arm is again mangled, and pinned via a blade, to the roof of the derailed carriage, paralleling D'borg's's pinned arm in Bloodborg.

1 **Key Similarities** 2 Limb Loss & Reconstruction 3 Sevika loses her left arm and replaces it with a cybernetic prosthetic enhanced 4 with Hextech and Shimmer. 5 **D'Borg** loses her left arm and right leg, undergoing a full-body reconstruction 6 7 with scavenged machine parts and synthetic bioengineering. 8 9 Scavenged Machine Parts for Prosthetics 10 Sevika's cybernetic arm is reassembled using scavenged parts by Jinx in Arcane 11 Season 2. 12 13 **D'Borg** is rebuilt using scrap metal, vehicle parts, and synthetic flesh, notably 14 metal from a yellow cab bonnet. 15 16 Arm Being Pinned by a Blade 17 Sevika's arm is impaled and pinned during a fight in Arcane Season 2. 18 19 **D'Borg's** arm is mangled and pinned to the roof of a derailed carriage with a 20 blade during a battle with Warwick. 21 Post-Rebuild Strength & Combat Enhancement 22 Sevika becomes a powerful enforcer for Silco, with her cybernetic arm granting 23 her extreme strength. 24 25 D'Borg gains enhanced capabilities through her mechanical and biological 26

upgrades, allowing her to fight on a higher level.

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DETAILED BREAKDOWN AND ANALYSIS OF EPISODE 3, SEASON 1 OF ARCANE: SUPPORTING EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE

Conclusion

- Both characters suffer severe limb loss and undergo cybernetic reconstruction, which transforms them into enhanced warriors.
- ii. Both experiences left arm damage and pinning via a blade, making the injury and its recurrence a key aspect of their respective arcs.
- iii. While Sevika's Hextech/Shimmer prosthetic is more streamlined,D'Borg's rebuild is more intricate, incorporating both mechanical and organic restoration.
- iv. The use of scavenged materials, the theme of prosthetic enhancement, and the key injury recurrence suggest that Arcane may have drawn inspiration from Bloodborg, adapting key elements to fit the world of Zaun.

Final Allegation:

Sevika's cybernetic transformation and arm-pinning scene in Arcane share distinct thematic and narrative parallels with D'Borg's reconstruction and battle injuries in Bloodborg, reinforcing the claim of conceptual borrowing.

EXHIBIT L- FLAMMABLE SHIMMER ROOTS.

As the explosion happens in the crab factory, the shimmer roots catch fire. The fire runs along the root system and blows up Silco's lair and burns Singed.

In Arcane, the Shimmer roots grow from Shimmer, further suggesting it is a bioengineered drug, perhaps still alive in that respect.

However, we later learn, in episode 3, that these tentacle-like roots or weeds are flammable. Singed's facial scars are implied to result from these chemical burns, so perhaps they were added just to ignite a fire to rework Singed's backstory to fit Arcane. In the LOL lore, the scar was inflicted by Warwick, a werewolf, and Singed wears bandages to hide it.

The Plaintiff alleges that it would be an astonishingly strange coincidence for these features to have been chosen just for aesthetics and yet they match those found in a makeshift marine lab and other places in Bloodborg.

Bloodborg,

"Weeds and strange yellow spiky finger-like marine flora, climbed the walls of the stairwell, squeezing into the cracked plaster, and pulling at the brickwork, as if Mother Gaia was dragging the building down into the water- her stomach acid."





DETAILED BREAKDOWN AND ANALYSIS OF EPISODE 3, SEASON 1 OF ARCANE: SUPPORTING EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE

EXHIBIT M- ADOPTIVE BROTHER IMPALED

Macaulay in Bloodborg is exactly the same as Mylo, except he has blonde hair.

Bloodborg, "Macaulay was impaled through his abdomen with the huge

antenna...



Mylo (Arcane): Mylo's story comes to a tragic end during the heist of Vander, gone wrong. He is impaled by a pole through his body. In a moment that solidifies the divide between Powder (Jinx) and the rest of the group, Powder's failed attempt to help leads to Mylo's death. His demise, along with the death of Claggor, represents the shattering of the group and the ultimate tragedy of Powder's attempts to prove her worth. His death serves as the emotional tipping point for Powder's transformation into Jinx.

Macaulay (Bloodborg): Macaulay, too, meets a tragic end. He is impaled by a pole through his body. In Rook's POV, Macaulay's death is devastating, shattering Rook's emotional world. His loss is the moment that breaks Rook's innocence and solidifies her path of revenge and survival, the same tipping point we see in Vi and Jinx's storylines. Like Mylo, Macaulay's death acts as a catalyst for the main character's emotional and psychological transformation.

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Comparison & Analysis- Adoptive Brother Impaled: Macaulay (Bloodborg) vs. Mylo (Arcane)

Both Bloodborg and Arcane feature the tragic deaths of the protagonist's adoptive brother, who is impaled during a mission gone wrong. In both stories, their deaths are significant emotional and narrative turning points, leading to the transformation of the protagonists, Rook in Bloodborg and Powder (Jinx) in Arcane.

Mylo (Arcane):

- i. Impaled by falling debris during a failed mission to rescue Vander.
- ii. His death is directly linked to Powder's (Jinx's) failed attempt to help, leading to Vi abandoning her and causing a permanent psychological rift between them.
- iii. Serves as a tipping point in Powder's transformation into Jinx.

Macaulay (Bloodborg):

- Impaled through the abdomen by a large antenna, in a tragic moment of violence.
- ii. His death shatters Rook emotionally, marking the loss of her innocence and pushing her onto a path of revenge and survival.
- iii. Functions as a narrative catalyst, similar to Mylo, where his death transforms the protagonist into a hardened warrior.

Conclusion

The parallels between Macaulay's and Mylo's deaths suggest a striking narrative and thematic overlap. Both characters serve as the beloved yet underestimated adoptive brother, both die impaled, and both trigger the protagonist's transformation into a more hardened, emotionally detached warrior. The emotional weight, sequence, and aftermath of their deaths bear remarkable similarities, supporting the claim that Bloodborg's character Macaulay may have been a source of insight for Mylo's character arc in Arcane.

EXHIBIT N- VANDER'S FIGHT WITH A JUICED-UP MUTANT

DECKARD

N1- The Set-Up

In Arcane, After the explosion, Vander- later becomes Warwick- lifts his head to evaluate the damage and see the enemy (Deckard Monster) coming.

In Bloodborg, "He gripped the back of Jade's collar in one hand and Katsuko's injured arm in the other hand. With an almighty roar he dragged them four steps to the rear window. He jumped out of the window, dragging the unconscious bodies with him. The three of them bounced against the rails. The carriage continued skidding along the rail. Warwick lifted his head to see the carriage stop, hanging off the edge of the Sky-rail."

In both stories, this devastating lull in the aftermath of disaster sets up the final showdown.



N2- Fists like Anvils

Bloodborg: "His flappy, open-palmed hands had regrouped into fists like anvils, which shot straight forward on chunky Hydraulic like arms. His precision was clinical. His speed surpassed that of the Cyborg in front of him. He was more than a hybrid; he was human to the core, burning with emotion; Fear, anger, worry, regret and hope. Hope drove him the most. He hoped to save Jade and Katsuko, he hoped to save the innocent people of New Kowloon."

Whilst *Fists like Anvils* is a metaphorical expression in Bloodborg, in Arcane, angry Vander literally snaps off chunky metal foot stirrups and uses them as knuckledusters.

In Arcane,





N3- KNOCKED BACK

In Arcane, Vander's raw aggression, speed and precision knock the shimmer-mutant backwards. This is overemphasized with blows showing the backwards traveling trajectory, The Mutant's face and purple shimmer blood spluttering backwards, a feet-slip backwards, then a stumble backwards.

Bloodborg, "He landed several punches, connecting square on the fleshy part of D'borg's face. She stumbled backwards as he continued his onslaught."



N4- Headbutt

Bloodborg, "She lowered her chin to her chest and rammed her forehead forward."

In Arcane, the Mutant Deckard also headbutts Vander during this fight.





N5- Cartilage Crackled

Vander is stabbed in the Back by Silco. In this image you see Vander's hand wrapped around Silco's neck. We heard the cartilage of his throat crackling.

Bloodborg, "With her free hand, D'borg gripped Warwick by the throat, squeezing his windpipe and lifting him off the ground. The cartilage of his throat crackled as he choked on his last breath."





N6- Vander Falling / Pushed.

In Arcane, Silco stabs Vander in the belly. Vander has Silco by the throat but experiences a flashback, ceasing his attack. Vander is pushed, and falls backward off the platform. Vander lands on a mound of shimmer and rubble.

In Bloodborg, Warwick stabs D'borg. She has Warwick gripped by the throat. She released her grip on Warwick's throat, dropping him to the ground. She experiences a flashback, ceasing her fight.

Bloodborg, "The carriage rocked on the edge of the damaged Sky-rail track... the carriage tipped over the edge taking D'anna with it... The carriage had parted much of the smog, allowing him to see the carriage hit the flooded streets below with an almighty splash. D'anna landed on a mound of floating black bags full of rubbish."





N7- Shimmer Vander Snaps Deckard's Neck.

Mutated Deckard goes to attack Vi. Vander saves her. He has taken Shimmer and now he is a Shimmer monster. He lifts Deckard by his throat. We heard the cartilage of his throat crackling. Then the snap of his neck.

Bloodborg, "With her free hand, D'borg gripped Warwick by the throat, squeezing his windpipe and lifting him off the ground. The cartilage of his throat crackled as he choked on his last breath."





N8- Falls to his Death

Vander wants to go for Silco but realizes that the building is collapsing around them, and he needs to get Vi out, fast. He picks Vi up, runs and smashes through a wall, again falling to his second death.

Again, we see the theme of falling, which is alleged to have been swiped from the Plaintiff's actual trauma, written into Bloodborg.



Bloodborg, "He felt himself fading. The white fire burned in his eyes, consuming his sight. Cold numbness set through his body. Death has come to relieve me, he thought, sucking shallow gulps of oxygen out of the air, as the white fire devoured him."



DETAILED BREAKDOWN AND ANALYSIS OF EPISODE 3, SEASON 1 OF ARCANE: SUPPORTING EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE

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But, like Vander, is Warwick really dead? We find out that for both, the answer is no! In Bloodborg, Warwick is saved by Rook (Vi) activating medical mode on a spider-bot.

Bloodborg Ouote - "A single tear fell from Rook's eye, onto the glass cylinder; the pink and green network of neurons performed a fluorescent light show as the download reached 100%. Rook removed the glass cylinder from the computgun; its glow illuminated the surrounding area. Rook shone its light around in the drenching rain, examining the destruction Warwick had caused. She shone the cylinder close to the two women, one of which had been butchered, yet her wounds were healing, as a Spider-bot tended to them. She peered back at Warwick, with the spider-bot sat on his chest. She knelt to wipe the rain and blood off his face. She pushed the symbol on the spider's back, activating the spider-bot. The tiny medic skittered across Warwick's chest, spinning webs over his wounds.

'Good Luck pal,' whispered Rook as she walked away."

In Arcane, Burnt and blown up Singed somehow carries the Shimmer monster Vander away and we later get a glimpse of him hanging from rafters, being turned into a werewolf. Then in season 2, he dies and comes back a bunch of times before he is turned into a Bloodborg werewolf with a gold head.



The step-by-step, literal visual reenactment of this final fight scene of the first act, strongly suggests that not only has this been taken from Bloodborg, but the actual words of Bloodborg were used to choreograph this pivotal fight scene.

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Comparison & Analysis- Vander's Fight with Mutant Deckard vs.

Warwick's Fight in Bloodborg

The final fight between Vander and the Shimmer-mutant Deckard in Arcane and Warwick and D'Borg in Bloodborg bear striking similarities in narrative structure, action choreography, and symbolic meaning. Both fights occur after a moment of devastation, both feature a hybrid, mutated warrior engaging in brutal close combat, and both culminate in a fall, presumed death, and later resurrection.

N1 – The Set-Up: Aftermath of Destruction

Arcane: Vander lifts his head to assess the damage and sees the enemy approaching (Mutant Deckard).

Bloodborg: Warwick, after dragging Jade and Katsuko to safety, lifts his head to see the Sky-rail carriage hanging over the edge, setting up the final confrontation.

Parallel: Both fights occur after explosive devastation, creating a lull before the final confrontation.

N2 – Fists Like Anvils: The Strength of the Fighters

Arcane: Vander rips metal stirrups from a machine and uses them as makeshift knuckledusters.

Bloodborg: Warwick's anvil-like fists strike with hydraulic power, making his attacks faster and stronger than his opponent.

DETAILED BREAKDOWN AND ANALYSIS OF EPISODE 3, SEASON 1 OF ARCANE: SUPPORTING EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE

1 Parallel: Both fighters are brutal brawlers, using enhanced strength and makeshift 2 weapons in combat. 3 4 N3 - Knocked Back 5 **Arcane:** Deckard is knocked backward multiple times, with slow-motion impacts 6 7 showing his staggered retreat. 8 **Bloodborg:** D'Borg is hit square in the face and stumbles backward as Warwick 9 continues his onslaught. 10 Parallel: The cinematic emphasis on backward movement visually enhances the 11 force of each attack. 12 13 14 N4 – Headbutt 15 Arcane: Mutant Deckard headbutts Vander. 16 **Bloodborg:** D'Borg, in a defensive move, lowers her head and headbutts 17 Warwick. 18 19 **Parallel:** Headbutting is used as a tactical move in both fights. 20 N5 – Cartilage Crackling: The Chokehold 21 **Arcane:** Vander wraps his massive hand around Silco's throat, crushing his 22 windpipe, cartilage crackling. 23 **Bloodborg:** D'Borg grips Warwick by the throat, lifting him off the ground as his 24 25 cartilage crackles. 26 **Parallel:** The graphic description of the windpipe crushing is identical in both. 27 DETAILED BREAKDOWN AND ANALYSIS OF EPISODE 3, SEASON 1 OF ARCANE: SUPPORTING EVIDENCE 28 FOR COPYRIGHT INFRINGEMENT CASE

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N6 – The Fall: Pushed to Their Deaths

Arcane: Silco stabs Vander, causing flashbacks, and Vander falls backward off the platform, landing on rubble and Shimmer vials.

Bloodborg: Warwick stabs D'Borg, she releases him, experiences flashbacks, and falls off the Sky-rail carriage, landing on floating garbage bags.

Parallel: Both fights climax with the hero being stabbed, experiencing flashbacks and falling into a symbolic "death."

N7 – Snapping the Neck: Vander Kills Deckard, D'Borg Kills Warwick

Arcane: Shimmer-mutated Vander lifts Deckard by the throat and snaps his neck, crushing cartilage.

Bloodborg: D'Borg lifts Warwick by the throat, crushing cartilage, as he chokes

Parallel: Both scenes feature a character using enhanced strength to lift their enemy by the throat, ending their fight.

N8 – Falling Again: The Hero's Final Sacrifice

Arcane: Vander, realizing the building is collapsing, grabs Vi and jumps through a wall, falling again.

Bloodborg: Warwick, succumbing to his wounds, feels himself fading as death consumes him.

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DETAILED BREAKDOWN AND ANALYSIS OF EPISODE 3, SEASON 1 OF ARCANE: SUPPORTING EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE

Parallel: The hero's second fall represents a final, sacrificial act, reinforcing their tragic fate.

N9 – Not Really Dead: Resurrecting as a Monster

Arcane: Vander is later revealed to be alive and is experimented on, leading to his transformation into Warwick.

Bloodborg: Warwick is saved by a Spider-bot, which weaves synthetic material over his wounds, keeping him alive.

Parallel: Both Vander and Warwick "die" but are later resurrected as something more monstrous. Bloodborg: The Harvest the first book of a trilogy.

Conclusion

The step-by-step choreography, narrative beats, and visual execution of Vander's final fight mirror Warwick's fight in Bloodborg to a striking degree.

Shared structural elements: devastation, slow realization of the enemy approaching, anvil-like fists, dramatic knockbacks, brutal headbutts, windpipe crushing, a thematic fall to "death," and eventual resurrection.

Core Allegation: The fight's sequence, action choreography, and even key phrasing (cartilage cracking, headbutts, falling off platforms, impalement, and enhanced strength) match too precisely to be mere coincidence.

Further Evidence: The fact that Vander later becomes Warwick, mirroring the Bloodborg character Warwick, strengthens the claim that Bloodborg's fight sequences were adapted and restructured into Arcane. It is alleged that, after accessing the Bloodborg manuscript, the "Creators" of the failing show Arcane, saw the opportunity to squeeze their cardboard characters into the Bloodborg narratives, which has also now been made into the cannon lore of the whole of the LOL universe.

The set ups, the execution, the lulls in battles, micro details, the macro details, characters command replies, technologies, and even the fight choreography are strikingly similar.

EPISODE 3 CONCLUSION

The comparative analysis presented in this document demonstrates a substantial similarity between Bloodborg and Arcane, particularly in key plot structures, thematic elements, character arcs, visual and aesthetic details, and narrative execution. The repeated restructuring, repurposing, and remixing of core elements from Bloodborg into Arcane strongly suggests that Riot Games engaged in unauthorized derivation of the Plaintiff's copyrighted work.

The parallels are not mere coincidences or general tropes found in speculative fiction. Instead, they follow a clear and consistent pattern of borrowing, modifying, and obscuring elements from Bloodborg, reconfiguring them to fit Arcane's world.

This is evident in:

- Character Parallels (Warwick from Bloodborg vs. Vander & Warwick from Arcane).
- ii. Narrative Structure (Brotherly betrayal, warlords, cybernetic enhancements, biological experimentation).
- iii. Thematic Overlaps (War preparations, bio-engineering, underground factions, economic oppression).
- iv. Action Sequences and Fight Choreography (Notable step-by-step recreation of pivotal fight scenes).
- v. Symbolism and Storytelling Devices (Smoke flares, impalements, teleportation tech, and eye-focused transformations).

Moreover, the method of masking, rearranging characters, slightly altering plot mechanics, and reframing motivations, aligns with known techniques used in narrative repurposing, suggesting intentional misappropriation rather than coincidental thematic similarity.

Therefore, Riot Games' conduct constitutes a direct infringement of the Plaintiff's intellectual property rights, justifying legal action under U.S. and international copyright law.

LEGAL CITATIONS & FRAMEWORK:

1. Copyright Infringement Under U.S. Law

Copyright Act of 1976 (17 U.S.C. § 501): Grants protection to original literary works and provides legal recourse for infringement.

Sheldon v. Metro-Goldwyn Pictures Corp. (1936): Establishes that substantial similarity in storytelling and narrative elements qualifies as infringement.

Rogers v. Koons (1992): Demonstrates that minor modifications do not protect against infringement if the core meaning and expression remain identical.

Feist Publications, Inc. v. Rural Telephone Service Co. (1991): Reinforces that original selection, arrangement, and creative expression are protected.

DETAILED BREAKDOWN AND ANALYSIS OF EPISODE 3, SEASON 1 OF ARCANE: SUPPORTING EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE

	ase 2:25-cv-00053-FMO-BFM Document 50 Filed 02/17/25 Page 99 of 100 Page ID #:1796
1 2	2. Copyright Protection Under U.K. Law
3 4	Copyright, Designs, and Patents Act 1988 (CDPA 1988): Establishes copyright protection for literary works in the United Kingdom.
5 6	protection for nicrary works in the Office Kingdom.
7	Baigent & Leigh v. Random House (2006): Reinforces that thematic structure and
9	key elements can be protected, not just exact wording.
10 11	3. Additional Legal Theories Supporting the Plaintiff
12 13	Unfair Competition (Lanham Act, 15 U.S.C. § 1125): If Riot Games benefited
14 15	commercially from infringing works, they engaged in unfair business practices.
16 17	Derivative Work Argument (17 U.S.C. § 101): Even with minor modifications,
18 19	Arcane constitutes an unauthorized derivative work of Bloodborg.
20 21	Intentional Misrepresentation & Fraud: The systematic reorganization of
22 23	Bloodborg's themes and narratives suggests an attempt to conceal the original source material while profiting from it.
24 25	
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28	DETAILED BREAKDOWN AND ANALYSIS OF EPISODE 3, SEASON 1 OF ARCANE: SUPPORTING EVIDENCE

FOR COPYRIGHT INFRINGEMENT CASE

This detailed breakdown, side-by-side comparison, and legal argumentation substantiate the claim of copyright infringement, narrative misappropriation, and unfair competition, thereby warranting formal judicial intervention against Riot Games, Inc.

Declaration

I, Marc Wolstenholme, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief. I submit this declaration in support of my Detailed Breakdown and Analysis of Episode 3: Supporting Evidence for Copyright Infringement Case, providing a detailed comparison of the alleged infringement of my original work, Bloodborg, by Riot Games, Inc.

Respectfully submitted,

The Plaintiff, Marc Wolstenholme, M.W. Wolf.

Date: FEBRUARY 17, 2025

Signed: M.WOLSTENHOLME.